



Assessing Potential Sites

How have potential sites been identified and assessed?

2.1 National planning guidance states that councils should identify all sites and broad locations regardless of the amount of development needed to provide an audit of available land. In 2018 we started the process of identifying potential sites by undertaking a review of existing and emerging plans (including Neighbourhood Plans), background evidence and recent planning

applications. We also invited people to suggest sites to us through an open 'Call for Sites'. The full list of the information sources is set out in Figure 2.1. In total we identified over 220 potential sites – a full list of identified sites is set out in Appendix 1.

Existing allocations <ul style="list-style-type: none"> • Site Allocations Plan • Fitzrovia Area Action Plan 	Sites identified in other plans <ul style="list-style-type: none"> • Neighbourhood Plans • Area frameworks
Major sites <ul style="list-style-type: none"> • Permitted/pending planning applications • Pre-application discussions 	London Strategic Housing Land Availability Assessment (SHLAA) <ul style="list-style-type: none"> • The London SHLAA is a technical exercise to determine the quantity and suitability of land potentially available for housing development.
Call for sites <ul style="list-style-type: none"> • December 2017 - February 2018 	Other <ul style="list-style-type: none"> • Sites identified in Camden's Community Investment Programme • Sites suggested by Council officers

Figure 2.1: Site identification information sources

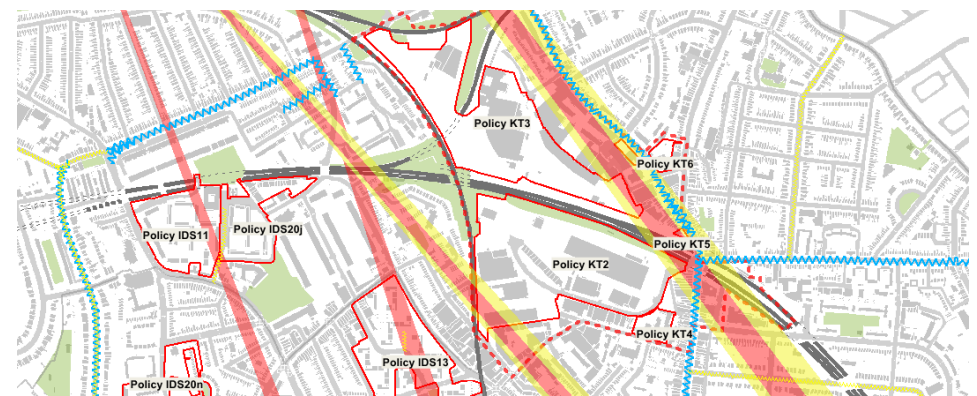
Question box

Q.3 Are there any other information sources that we should be looking at to identify potential sites?

Q.4 Are there any other sites which you think should be included within the assessment? If yes, please set out additional information about the site including an address and/or map showing the site boundary; and a clear description of the type and scale of development that you believe could be accommodated on the site?

2.2 Given the number of sites identified we decided to undertake a staged assessment to ensure that we would only need to do a more detailed analysis of sites which had the most potential. The key stages in the assessment process are set out in Figure 2.2. To help us answer the questions shown in Figure 6 and assess the suitability, availability and achievability of

sites we used a blend of desktop assessments, informal discussions and site visits. Information sources used in the desktop assessment included Council-owned mapped data (environmental designations, policies etc.), emerging and adopted planning frameworks and evidence documents used to prepare the Camden Local Plan 2017 and responses to previous Council consultations.



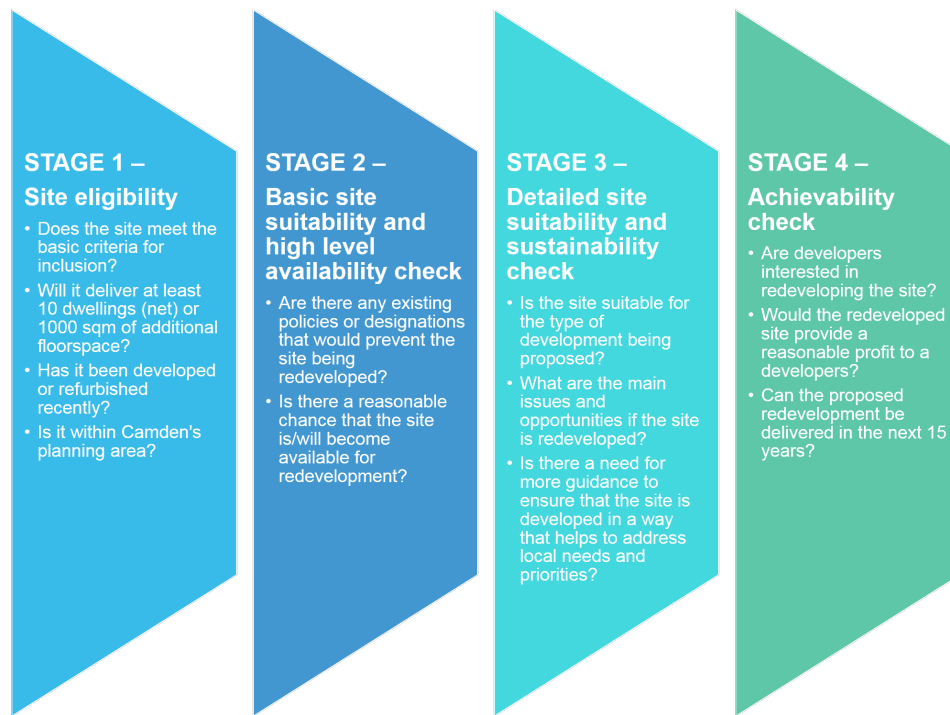


Figure 2.2: Key Assessment Stages

Question box

Q5. Do you think that the site assessment process used by the Council to review potential sites is appropriate? If not, what changes are needed and why?

What evidence documents have been used in the assessment process?

2.3 The policies in the Site Allocations Local Plan need to reflect up to date and relevant evidence about the social, economic and environmental characteristics and prospects of the area and must meet identified needs. In preparing the Camden Local Plan 2017 the Council collected a wide range of evidence. We consider that the majority of this evidence remains relevant and up to date and forms a robust basis for policies within this Plan but for some matters we recognise that there is a need to produce new or updated evidence to support the production of

this Plan. Key evidence documents that the Council intend to produce/ update include but are not necessarily limited to:

- Sustainability Appraisal
- Equalities Impact Assessment
- Habitats Regulations Assessment (Screening)
- Camden Infrastructure Delivery Plan
- Site Allocations Viability Study

The draft Site Allocations plan has been subject to a number of impact assessments, including Sustainability Appraisal (incorporating Strategic Environmental Assessment), Health Impact Assessment and Equality Impact Assessment. The Sustainability Appraisal assessed the environmental, social and economic impacts of the Plan, including an appraisal of alternative approaches for addressing a range of key plan issues.

Infrastructure study

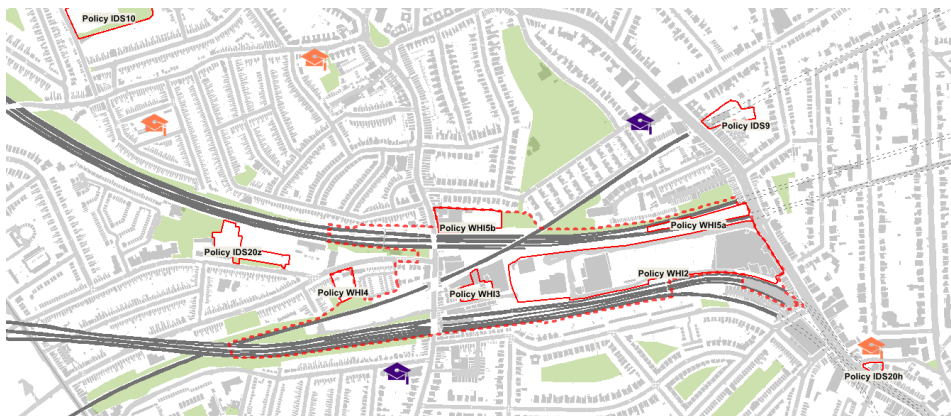
2.4 The delivery of new infrastructure to meet the needs of the local community and business is crucial to the development of Camden as a place where everyone has a chance to succeed and where nobody gets left behind.

2.5 In 2015 the Council finalised a new Infrastructure Study. This study set out the strategic items of infrastructure needed to support growth over the lifespan of the Local Plan. It reviewed relevant infrastructure providers' plans and strategies and was informed by consultation with infrastructure providers.

2.6 Since the Infrastructure Study was completed several providers have updated their estate and service delivery plans. To ensure that the Site Allocations Local Plan is based on robust and sound evidence we have started to review the 2015 Infrastructure Study and have commissioned an

updated baseline assessment. This assessment sets out the current level of provision of each infrastructure type within the Borough as well as providing indicative commentary of future infrastructure considerations. Discussions, meetings and workshops have taken place with a variety of infrastructure providers, both within the Council and with external organisations, to develop an understanding of the current baseline infrastructure position. This baseline report is available to view on our website.

2.7 After the consultation period on the Site Allocations Local Plan has ended, we will start work on an Infrastructure Delivery Plan to identify a series of area/site specific projects to mitigate both the impact of individual sites and the cumulative impact of new growth in Camden and ensure that the infrastructure needed to support the delivery of new homes and business growth and the creation of sustainable, healthy communities is provided.



The health and social care needs of residents are changing and the way that the health service is organised means that waiting times for some services, as well as the health outcomes, vary across Camden and the wider north central London area.

To help ensure that the needs of residents are met clinical commissioning groups, local authorities and NHS providers across the north central London area have worked together to develop an area-wide Sustainability and Transformation Plan (STP). The programme of transformation set out in the STP contains four fundamental elements:

- **Prevention:** Many of the health challenges facing our population arise from preventable conditions. Increasing efforts on prevention and early intervention will improve health and wellbeing outcomes for the whole population
- **Service transformation:** There are emerging technologies and new and better ways to deliver services. To meet the changing needs of our population there is a need to transform the way services are delivered
- **Productivity:** It is recognised that working in a more collaborative way will help remove duplication, unnecessary costs and achieve efficiencies
- **Enablers:** There is a need to build capacity in digital, workforce, estates and new commissioning and delivery models to enable transformation.

Recently the STP partnership have started to undertake a locality planning exercise to ensure that the health estate is fit for purpose, cost-effective, integrated, accessible and enables the delivery of high quality health and social care services for local communities. As this work progresses the findings will feed into the infrastructure study and policies within this Plan.

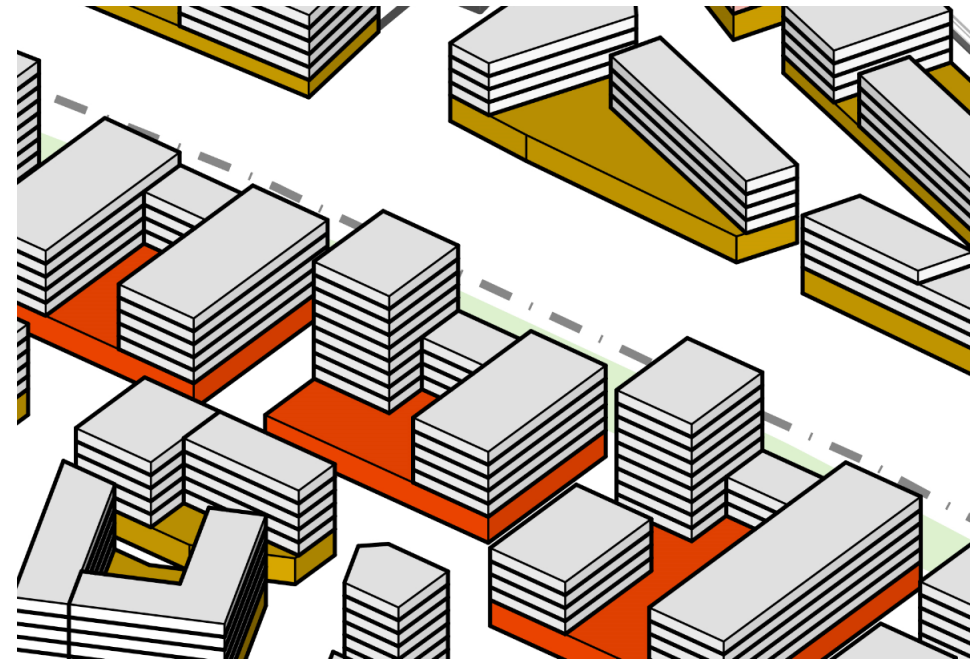
Does the plan consider/allocate sites to meet different types of housing needs?

2.8 National policy and guidance states that housing needed for different groups in the community should be assessed and reflected in planning policies. This includes, but is not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, people who rent their homes and people wishing to commission or build their own homes.

2.9 The Camden Local Plan 2017 includes a number of borough-wide policies that seek to address the specific housing needs of a number of groups in our community. These policies form part of the development plan and should be considered alongside relevant policies within this Plan when designing proposals for specific development sites.

2.10 The Council is in the process of undertaking additional work looking at the needs of specific groups. In 2019 the Council completed a detailed needs assessment for people with a learning disability. This assessment concluded that there will be a need for 26 additional self-contained supported homes by 2035. There is also a need for a replacement 'Crisis House' facility for people with mental health issues as the current facilities in the borough are not considered to be fit for purpose and need to be replaced.

2.11 An updated assessment of needs relating to older people is still emerging but there is a need for at least 40 affordable extra care units in Camden and a council commissioned nursing care home.



How has the Plan ensured that allocated sites make the most efficient use of land?

2.12 National planning policy and guidance states that plans should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

2.13 In the context of Camden the need to make efficient use of land and intensify uses on individual sites is critical given the scale of growth needed to meet the borough's need for homes, jobs and facilities and the limited amount of available land.

2.14 The Council has used a range of different information sources to help determine the housing capacity of growth areas and individual sites including the London Strategic Housing Land Availability Assessment, previous planning applications, call for site submission forms, site visits and relevant design/conservation documents. If a site has planning permission then the draft policy has generally used the permitted capacity. For sites without planning permission we have undertaken a high level desktop analysis using the information available to work out an indicative housing capacity.

Question box

Q7. Some of the policies within this Plan reference the needs of specific groups. Are there any areas or sites that you think should include set targets for a specific type of housing? If yes, please set out additional information about the site including: the policy/site assessment reference if it is an existing site or address and map showing the site boundary if it is a new site; a clear description of the type and scale of development that you believe could be accommodated on the site; and any evidence you have relating to the need for this type of housing in this area and the suitability of the suggested site.

Q8. Do you think that the approach used by the Council to determine the housing capacity of growth areas and individual sites is appropriate? If not, what changes are needed and why?

How have potential sites for new Gypsy and Traveller pitches been assessed?

2.15 The Camden Local Plan states that 16 additional pitches will be needed for Camden's established traveller community by 2031 that includes an immediate need for 7 additional pitches by 2020/21. Since the adoption of the Local Plan in 2017 there have been no planning applications submitted for potential traveller sites and no sites have been submitted to the Council to consider for future allocation. As a result the Council has not been able to identify any potential sites in this draft Plan.

2.16 Following consultation on this draft Plan the Council is intending to undertake a comprehensive review of its own land and other suggested

sites to identify potential sites for new pitches and assess whether or not they are suitable, available and achievable. An overview of the site identification and assessment process the Council intends to undertake is set out in Figure 2.3. The Council's assessment of the need for additional gypsy and traveller pitches was carried out in 2014. Since then, there have been changes to national policy, and a new draft London Plan with specific proposals in relation to gypsies and travellers. Following consultation on this draft Plan, we will also consider whether there is a need to update our assessment of the need for additional pitches.

Question box

Q9. Do you think the Council should update its assessment of the need for additional pitches?

Q10. Is the proposed approach to identify and assess sites for new gypsy and traveller pitches appropriate?

Q11. Are there any other information sources that we should be looking at to identify potential sites for new pitches?

Q12. Are there any specific sites which you think should be included within the assessment?

If yes, please set out additional information about the site including: the policy/site assessment reference if it is an existing site or an address and map showing the site boundary if it is a new site; a clear description of the type and scale of development that you believe could be accommodated on the site; and any evidence you have relating to the suitability of the suggested site for this purpose.

Stage 1: Site identification	<ul style="list-style-type: none"> ▪ Call for site submissions ▪ Council owned sites <ul style="list-style-type: none"> <input type="checkbox"/> Focus on undeveloped land parcels, including previously developed sites and infill sites ▪ Sites put forward for consideration by communities/ key stakeholders in response to this consultation
Stage 2: Availability assessment	<ul style="list-style-type: none"> - Site status <ul style="list-style-type: none"> <input type="checkbox"/> Is the site protected by an open space designation (e.g. park, metropolitan open land, nature conservation site?) <input type="checkbox"/> Is the site required for an existing or alternative use? <input type="checkbox"/> Is the site currently available/ likely to become available for development in the plan period?
Stage 3: Suitability assessment	<ul style="list-style-type: none"> ▪ Suitability assessment should be made in accordance with whether the site is capable of providing an acceptable standard of amenity for housing use, and relevant parts of: national planning policy; the emerging London Plan; and the Local Plan. Local Plan Policy H11 states that new sites, pitches and/or plots for travellers should: <ul style="list-style-type: none"> a. be accessible to public transport, services and facilities, and be capable of support by local social infrastructure b. be capable of connection to energy, water and sewerage infrastructure c. provide safe access to and from the main road network d. support the health and wellbeing of the occupiers e. provide an appropriate layout and facilities f. be attractive and of the highest design quality g. protect local amenity and the environment
Stage 4: Achievability assessment	<ul style="list-style-type: none"> ▪ Viability/deliverability analysis
Stage 5: Overcoming constraints and Duty to Cooperate	<ul style="list-style-type: none"> ▪ If the assessment process does not identify enough sites to meet Camden's identified needs then the Council will explore whether or not potential constraints relating to availability, suitability and achievability can be overcome ▪ Discussions with other authorities under the Duty to Cooperate <ul style="list-style-type: none"> <input type="checkbox"/> Are any other Local Authorities in the housing market area able to help meet any unmet needs for new pitches?

Figure 2.3: Site assessment process for new gypsy and traveller pitches